



ALAN LESCHT
& ASSOCIATES, P.C.

Application granted. The deadline by which the parties shall complete fact discovery is adjourned to July 28, 2022.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 79.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
July 1, 2022

BY ECF

The Honorable Philip M. Halpern
United States District Court
500 Pearl Street
New York, NY 10007

Re: McFall v. Walsh, Case No. 19 CV 11581 (PMH) (S.D.N.Y.)

Dear Judge Halpern:

I represent plaintiff Kathleen McFall in her employment discrimination action against Martin J. Walsh, Secretary, United States Department of Labor (“DOL”) under Title VII of the Civil Rights Act of 1964. I write regarding the Civil Case Discovery Plan and Scheduling Order currently in place, ECF No. 73.

Both parties respectfully request that the completion of discovery, including depositions, be extended to July 28, 2022 from its current deadline of July 15, 2022. The parties have been working proactively to schedule depositions for the seven individuals Plaintiff proposes to depose and for the two individuals Defendant proposes to depose. However, due to counsel’s prior commitments on the limited days on which the proposed deponents are available, and the unavailability of one deponent due to personal issues until later in July, counsel request a short extension of the discovery schedule.

This extension will not require any additional modifications to the Civil Case Discovery Plan and Scheduling Order. Moreover, should this Court grant Defendant’s Letter Motion at ECF No. 74, counsel for Defendant intends to request an extension to permit the review of Plaintiff’s discovery before her deposition, which, if granted, would likely require an extension beyond the date respectfully requested in this Letter Motion.

Respectfully,

Conor Ahern

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cc: Brandon Cowart (by ECF)
Defendant's Counsel